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13 Police Department, Sheriff Joseph Lombardo,
14 Andrew Bauman, Matthew Kravetz, Supreet Kaur,
15 David Jeong, and Theron Young

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 PHILLIP SEMPER, an individual; COREY
19 JOHNSON, an individual; ASHLEY
20 MEDLOCK, an individual; CORY BASS, an
21 individual; MICHAEL GREEN, an
22 individual; DEMARLO RILEY, an
23 individual; BREANNA NELLUMS, an
24 individual; CLINTON REECE, an individual;
25 ANTONIO WILLIAMS, an individual;
26 LONICIA BOWIE, an individual; CARLOS
27 BASS, an individual; and DEMETREUS
BEARD, an individual,

Case Number:
2:20-cv-01875-JCM-EJY

STIPULATION AND ORDER TO STAY
CASE PENDING SETTLEMENT
DISCUSSIONS

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, in its official capacity;
SHERIFF JOSEPH LOMBARDO,
individually and in his official capacity as
Sheriff of the Las Vegas Metropolitan Police
Department; ANDREW BAUMAN,
individually and in his capacity as a Las
Vegas Metropolitan Police Department
Officer; MATTHEW KRAVETZ,
individually and in his capacity as a Las
Vegas Metropolitan Police Department
Officer; SUPREET KAUR, individually and
in his capacity as a Las Vegas Metropolitan
Police Department Officer; DAVID JEONG,
individually and in his capacity as a Las
Vegas Metropolitan Police Department
Officer; THERON YOUNG, individually and

1 in his capacity as a Las Vegas Metropolitan
 2 Police Department Officer; CAESARS
 3 ENTERTAINMENT CORPORATION
 4 D/B/A RIO ALL-SUITES HOTEL; RIO
 5 PROPERTIES, LLC; JOHN CARLISLE,
 6 individually and in his capacity as an
 employee of the Rio Hotel & Casino; DOE
 LVMPD GANG TASK FORCE OFFICERS
 1-10; DOE LVMPD OFFICERS 1-10; DOE
 LVMPD SUPERVISORS 1-5; DOE RIO
 EMPLOYEES 1-10,

7 Defendants.

8 **STIPULATION AND ORDER TO STAY CASE PENDING SETTLEMENT**
 9 **DISCUSSIONS**

10 Plaintiffs Phillip Semper, Corey Johnson, Ashley Medlock, Michael Green, Demarlo
 11 Riley, Clinton Reece, and Lonica Bowie, by and through their counsel of record,
 12 Christopher M. Peterson, Esq., of American Civil Liberties Union of Nevada, and
 13 Defendants, the Las Vegas Metropolitan Police Department (the “Department” or
 14 “LVMPD”), Sheriff Joseph Lombardo (“Lombardo”), Andrew Bauman (“Bauman”),
 15 Matthew Kravetz (“Kravetz”), Supreet Kaur (“Kaur”), David Jeong (“Jeong”), and Theron
 16 Young (“Young”), collectively (“LVMPD Defendants”), by and through their counsel of
 17 record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., of Marquis Aurbach Coffing,
 18 hereby stipulate and agree to stay all pending deadlines so that Plaintiffs and LVMPD
 19 Defendants can enter into settlement discussions and negotiations without incurring
 20 additional attorney’s fees and costs. This Stipulation is being entered in good faith and not
 21 for purposes of delay.

22 1. Throughout the instant litigation, counsel for the LVMPD Defendants and
 23 identified Plaintiffs have informally discussed the possibility of settlement.

24 2. At this stage, LVMPD Defendants and the identified Plaintiffs have
 25 conducted some discovery and now wish to explore the possibility of settlement without
 26 incurring additional time and expense litigating the instant matter.

1 3. As such, LVMPD Defendants and the identified Plaintiffs hereby agree and
2 request the Court enter a stay of all deadlines in the instant case until February 15, 2022.

3 4. This is the second request for a stay for purposes of settlement negotiations.

4 5. The identified Plaintiffs and LVMPD Defendants further agree and stipulate
5 that the stay does not effect any pending or outstanding written discovery responses and
6 such responses are due in accordance with the Federal Rules of Civil Procedure.

7 6. The identified Plaintiffs and LVMPD Defendants further agree and stipulate
8 that any depositions currently scheduled for deponents Detective Blake Walford for
9 November 16, 2021 and FRCP 30(b)(6) of LVMPD for December 9, 2021 are vacated. The
10 re-scheduling of these depositions and the scheduling of any additional depositions is stayed
11 until after February 15, 2022.

12 7. Notwithstanding the stay, the identified Plaintiffs and LVMPD Defendants
13 intend to and hereby agree to cooperate in the exchange of information as needed to
14 facilitate settlement.

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1 8. If the parties do not reach a settlement during the stay, the parties further
2 agree and stipulate that the parties will submit a new proposed Discovery plan to the Court
3 within fourteen (14) days of the expiration of the stay. The parties agree that the new
4 proposed Discovery Plan must provide, at a minimum, the same number of days to complete
5 the parties' outstanding obligations, including amending the complaint and disclosing expert
6 witnesses, as the current Discovery Plan but for the implementation of the stay provided by
7 this stipulation.

8 IT IS SO STIPULATED.

9 Dated this 12th day of November, 2021
10 AMERICAN CIVIL LIBERTIES UNION
11 OF NEVADA

12 By: /s/ Christopher M. Peterson
13 Christopher M. Peterson, Esq.
14 Nevada Bar No. 13932
15 601 South Rancho Drive, Suite B-11
16 Las Vegas, Nevada 89106
17 Attorneys for Plaintiffs Phillip Semper,
18 Corey Johnson, Ashley Medlock,
19 Michael Green, Demarlo Riley, Clinton
20 Reece, and Lonica Bowie

5 Dated this 12th day of November, 2021
6 MARQUIS AURBACH COFFING

7 By: /s/ Jackie V. Nichols
8 Craig R. Anderson, Esq.
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10 Jackie V. Nichols, Esq.
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13 Las Vegas, Nevada 89145
14 Attorneys for Defendants Las Vegas
15 Metropolitan Police Department,
16 Sheriff Joseph Lombardo, Andrew
17 Bauman, Matthew Kravetz, Supreet
18 Kaur, David Jeong, and Theron Young

19 ORDER

20 IT IS SO ORDERED this 12th day of November, 2021.

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22 UNITED STATES MAGISTRATE JUDGE

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